

**REMARKS**

Claims 1, 2, 5-10, 13-17 and 19-21 remain pending in the application. Applicant respectfully requests favorable reconsideration of the claims in view of the following remarks.

Claims 1, 2, 5-10, 13-17 and 19-21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Abramov et al. (U.S. Patent No. 6,486,832 B1) in view of Regnier et al. (U.S. Patent Application Number 2003/0222818) and further in view of Bulthuis (U.S. Patent Application Number 2003/0119523). Applicants respectfully traverses these rejections for the following exemplary reasons.

Applicant respectfully submits that the combination of Abramov et al., Regnier et al. and Bulthuis does not disclose or suggest the combination of the following features:

*“...directing an approximate maximum gain vector of the directional antenna toward the transmitted beacon;*

*determining a relative angular position of the approximate maximum gain vector;*  
*measuring a received strength of the transmitted beacon;*

*recording the relative angular position of the approximate maximum gain vector and the received strength of the transmitted beacon;*

*processing a plurality of recorded relative angular positions of the approximate maximum gain vectors and a plurality of recorded received strengths of the transmitted beacons to determine relative radio positions of the plurality of WAPs within the WLAN;*

*based upon the relative radio positions of the plurality of WAPs within the WLAN...*  
*estimating relative geographical locations of the plurality of WAPs based upon the relative radio positions of the plurality of WAPs; and*

*based upon estimates of the relative geographical locations of the plurality of WAPs, determining a geographical repositioning of the at least one of the plurality of WAPs that will remedy the deficiency,” as claimed in amended independent Claim 1, and similarly claimed independent Claims 9 and 17.*

Although Applicant agrees with the Examiner that Bulthuis does teach “estimating relative geographical locations of the plurality of WAPs based upon the relative radio positions of the plurality of WAPs; and based upon estimates of the relative geographical locations of the plurality of WAPs, determining geographical relocating of the at least one of the plurality of WAPs,” the manner in which Bulthuis estimates the relative geographical locations of the plurality of WAPs differs from the claimed invention. In Bulthuis, the relative geographical locations of various devices are determined using a microphone included within each of the devices that detects emanations from the other devices (*see paragraph 22 of Bulthuis*) or another type of conventional technique (*see paragraph 19 of Bulthuis*).

Applicant respectfully submits that the technique for estimating the relative geographical locations of the plurality of WAPs, as claimed in the present invention, is not a conventional technique, but rather a new and innovative technique. As such, Applicant respectfully disagrees with the Examiner’s statement on page 9 of the Detailed Action that Regnier teaches “recording the relative angular position of the approximate maximum gain vector (optimum) and the received signal strength of the transmitted beacon ...; and means for processing a plurality of recorded relative angular positions of the approximate maximum gain vectors and a plurality of recorded received strengths of the transmitted beacons to determine relative radio positions of the plurality of WAPs within the WLAN”.

The cited passages and other portions of Regnier merely describe a method for achieving the optimal antenna directional angle of an antenna apparatus of a mobile station. In particular, paragraph 37 of Regnier describes the placement or positioning of antenna elements on a housing of the antenna apparatus of the mobile station, while paragraph 42 describes a method for determining the optimum weight controls to be applied to each antenna element to fine tune the antenna beam pattern produced by the antenna apparatus. Regnier does not teach or disclose “*processing a plurality of recorded relative angular positions of the approximate maximum gain vectors and a plurality of recorded received strengths of the transmitted beacons*” that are transmitted by other WAPs, as claimed in the present invention. In addition, the positioning of antenna elements on a mobile station, as described in paragraph 38 of Regnier, cannot be said to read on determining relative radio positions of the plurality of WAPs within the WLAN by processing a plurality of recorded relative angular positions of the approximate maximum gain vectors and a plurality of recorded received strengths of the transmitted beacons.

For at least these reasons, Applicant respectfully submits that Claims 1, 2, 5-10, 13-17 and 19-21 are not obvious over the prior art of record. Accordingly, Applicant respectfully requests that the Examiner withdraw the § 103 rejection of Claims 1, 2, 5-10, 13-17 and 19-21.

**CONCLUSION**

As a result of the foregoing, the Applicant asserts that the remaining claims in the Application are in condition for allowance, and respectfully requests an early allowance of such claims.

The Commissioner is hereby authorized to charge any additional fees connected with this communication or credit any overpayment to Garlick Harrison & Markison Deposit Account No. 50-2126 (Ref. BP2488.2).

Respectfully submitted,

Date: April 29, 2008

/Holly L. Rudnick/Reg. No. 43,065  
Holly L. Rudnick  
Attorney for Applicant

**Garlick Harrison & Markison**  
P.O. Box 160727  
Austin, TX 78716-0727  
(214) 387-8097/office  
(214) 387-7949/facsimile